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**STATE CORPORATION COMMISSION**  
Division of Information Resources

September 4, 2019

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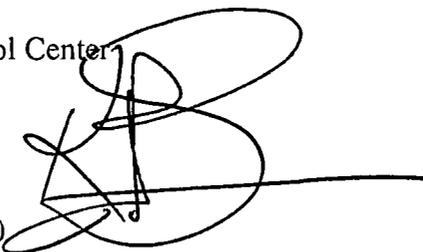
2019 SEP - 4 P 1:47

**MEMORANDUM**

**TO:** Document Control Center  
Clerk's Office

**FROM:** Ken Schrad

**RE:** PUR-2019-00050



I have attached a submission sent by e-mail to the State Corporation Commission on Tuesday, September 3, 2019.

I ask that you pass this correspondence to the referenced case file -

**PUR-2019-00050**

**Virginia Electric and Power Company - For determination of the fair rate of return on common equity pursuant to Va Code section 56-585.1:1 C**

Attachment – Letter from 36 members of the General Assembly



COMMONWEALTH OF VIRGINIA  
HOUSE OF DELEGATES  
RICHMOND

September 3, 2019

Joel H. Peck, Clerk  
Virginia State Corporation Commission  
Document Control Center  
P.O. Box 2118  
Richmond, VA 23128-2118

**Re: Case No. PUR 2019-00050**

To the Commission,

We urge the Commission to reject Dominion Energy Virginia's request to increase its return on equity (ROE) to be applied to rate adjustable clauses (RACs) and to measure earnings for the first triennial review proceeding in 2021 to 10.75%, up from the Commission's last approved ROE of 9.2% in 2017.

The Commission's staff have noted that this request would increase costs to ratepayers by at least \$147 million a year if granted in full. Expert witnesses representing the U.S. Navy, Walmart, the Virginia Poverty Law Center, and the Office of the Attorney General (OAG) have strongly opposed this increase.

In particular, we agree with the testimony from the U.S. Navy filed on behalf of all Federal Executive Agencies, which called this request "excessive, unnecessary, and burdensome."

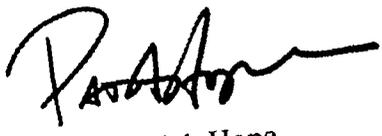
We further note testimony from the Virginia Poverty Law Center showing that in the Edison Electric Institute's 2018 Financial Review, approved ROEs for investor-owned utilities throughout the country are at historic lows, meaning it has rarely been cheaper for utilities to obtain the capital necessary to finance their investments and operations.

We urge the Commission to also carefully consider the expert testimony filed on behalf of the Office of the Attorney General (OAG), which indicates that a current market ROE for Dominion is in the range of 7.60% to 8.80%, with a recommended ROE for Dominion of 8.75%. We affirm the analysis of the OAG that this range of ROE accurately reflects market conditions and urge the Commission to follow their recommendations, which we believe are crucial to protect ratepayers from unnecessary financial burden.

We thank you for your time and your consideration of our comments.

Sincerely,

190910043



Patrick Hope  
Delegate, 47th District



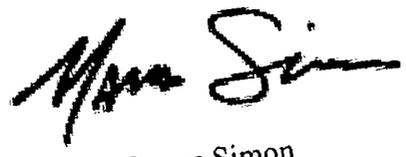
Rip Sullivan  
Delegate, 48th District



Lee Carter  
Delegate, 50th District



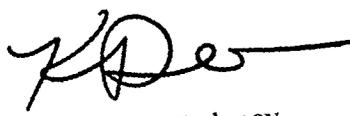
Hala Ayala  
Delegate, 51st District



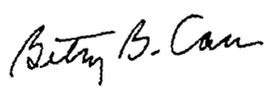
Marcus Simon  
Delegate, 53rd District



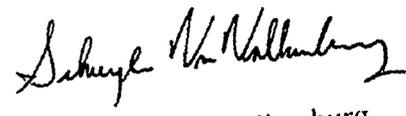
Lashrecse Aird  
Delegate, 63rd District



Karrie Delaney  
Delegate, 67th District



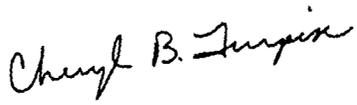
Betsy Carr  
Delegate, 69th District



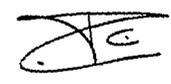
Schuyler Van Valkenburg  
Delegate, 72nd District



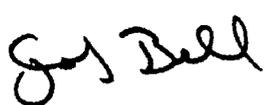
Debra Rodman  
Delegate, 73rd District



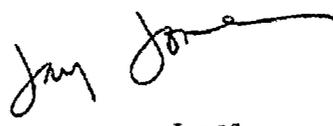
Cheryl Turpin  
Delegate, 85th District



Ibraheem Samirah  
Delegate, 86th District



John Bell  
Delegate, 87th District



Jay Jones  
Delegate, 89th District



Mike Mullin  
Delegate, 93rd District

Alfonso Lopez  
Delegate, 49th District

R. Creigh Deeds  
Senator, 25th District

Jeremy McPike  
Senator, 29th District

Jennifer Boysko  
Senator, 33rd District

Chap Petersen  
Senator, 34th District

Jennifer Carroll Foy  
Delegate, 2nd District

Wendy Gooditis  
Delegate, 10th District

Sam Rasoul  
Delegate, 11th District

Chris Hurst  
Delegate, 12th District

Danica Roem  
Delegate, 13th District

Kelly Convirs-Fowler  
Delegate, 21st District

Elizabeth Guzman  
Delegate, 31st District

David Reid  
Delegate, 32nd District

Mark Keam  
Delegate, 35th District

Kenneth Plum  
Delegate, 36th District

Kaye Kory  
Delegate, 38th District

Vivian Watts  
Delegate, 39th District

Kathy Tran  
Delegate, 42nd District

Paul Krizek  
Delegate, 44th District

Mark Levine  
Delegate, 45th District

Charniele Herring  
Delegate, 46th District